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8 *Attorneys for Defendant, Conn Appliances, Inc.*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 MELVIN NICHOLAS,

9 Plaintiff,

10 vs.

11 TRANS UNION, LLC; EXPERIAN  
12 INFORMATION SOLUTIONS, INC.; CONN  
13 APPLIANCES, INC.; LAS VEGAS FINANCE;  
14 AND SUN LOANS, LLC,

15 Defendants.

Case No.: 2:23-cv-02110-JCM-BNW

**JOINT MOTION TO EXTEND  
DEADLINE TO RESPOND TO  
PLAINTIFF'S COMPLAINT (FIRST  
REQUEST)**

16 Plaintiff, Melvin Nicholas ("Plaintiff"), and Defendant, Conn Appliances, Inc.  
17 ("Defendant") (collectively "Parties"), by and through their counsel of record, hereby stipulate and  
18 agree as follows:

19 On December 27, 2023, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served  
20 with Plaintiff's Complaint on December 28, 2023. The deadline for Defendant to respond to  
21 Plaintiff's Complaint is January 18, 2024. The Parties have discussed extending the deadline for  
22 Defendant to respond to Plaintiff's Complaint to allow for better investigation of the allegations  
23 and discuss possible resolution of the matter.

24 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to  
25 file its responsive pleading to Plaintiff's Complaint to February 20, 2024.

26 This is the first motion for an extension of time for Defendant to file its responsive  
27 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to  
28 any other party.

1 As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that  
2 occurs during the pendency of this extension.

3 DATED this 18th day of January, 2024.

4  
5 WRIGHT, FINLAY & ZAK, LLP

FREEDOM LAW FIRM

6 /s/ Ramir M. Hernandez

/s/ Gerardo Avalos

7 Ramir M. Hernandez, Esq.

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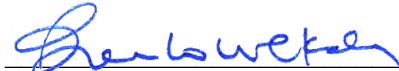
9 *Attorneys for Defendant, Conn Appliances,*  
10 *Inc.*

8985 S. Eastern Ave. Suite 350

Las Vegas, NV 89123

*Attorneys for Plaintiff, Melvin Nicholas*

11  
12  
13  
14 IT IS SO ORDERED:

15 

16 UNITED STATES MAGISTRATE JUDGE

17  
18 DATED: 1/19/2024

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** on the 18th day of January, 2024, to all parties on the CM/ECF service list.

/s/ Lisa Cox

An Employee of WRIGHT, FINLAY & ZAK, LLP